

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\_\_\_\_\_  
DONALD C. HUTCHINS

Plaintiff

v.

\_\_\_\_\_  
CARDIAC SCIENCE, INC., et. al.,

Defendants  
\_\_\_\_\_

Civil Action: **04-30126-MAP**

**MEMORANDUM OF LAW IN SUPPPORT OF PLAINTIFF'S MOTION TO  
DEFINE THE DEFENDANT COMPLIENT**

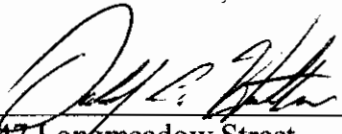
The Plaintiff, Donald C. Hutchins ("Hutchins") files this memorandum to clarify the entity known as Complient that is a Defendant in the action. The Court of Common Pleas of Cuyahoga County, Ohio has recognized the Complient Corporation ("Complient") in Case No. 540066 as being, "Complient and persons related to Complient" as disclosed in Exhibit A attached. Because the Complient Corporation has bought Ohio Case No. 540066 into this action it is correct that this Court recognize Complient in the identical context.

Page 2 of Exhibit A indicates that the Complient Corporation assumed responsibility and paid all the legal fees for six different actions against Hutchins. Complient initiated four of the six actions beginning in the year 2001 with Cuyahoga, No. 429394 and AAA Case No. 35-133-00022-01. The legal logs that accompanied Exhibit A show the legal persons consolidated with Complient to be CPR L.P., Jon Lindseth, Steven Lindseth, Axentis, CPR Prompt L.P and County Line Limited.

Ohio Case No. 540066 is currently under appeal before the Supreme Court of Ohio as Case GEN-2006-0741 per Exhibit B attached.

The Plaintiff  
Donald C. Hutchins, Pro Se

Dated: July 21, 2006

  
\_\_\_\_\_  
1047 Longmeadow Street  
Longmeadow, Massachusetts 01106  
(413) 567-0606

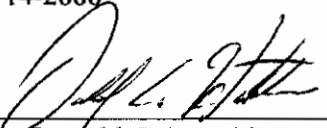
CERTIFICATE OF SERVICE

I, Donald C. Hutchins, 1047 Longmeadow Street, Longmeadow, Massachusetts 01106, hereby certify that I served a copy of the foregoing on the appropriate party by sending a copy by first class mail to:

John J. Egan, Esq., Egan, Flanagan and Cohen, P.C., 67 Market Street, Springfield, MA 91102-9035

Jeffrey J. Lauderdale, Esq., Calfee, Halter & Griswold LLP, 1400 McDonald Investment Center, 800 Superior Ave., Cleveland, OH 44114-2688

Dated: July 21, 2006

  
\_\_\_\_\_  
Donald C. Hutchins